

# THE BLANCH LAW FIRM A Professional Corp.

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RECEIVED  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
OCT 08 2009  
DATE FILED: OCT 08 2009

September 25, 2009

Honorable George B. Daniels  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**SO ORDERED:**  
*George B. Daniels*  
George B. Daniels, U.S.D.J.

Re: United States v. Ilya Boruch, Indictment No. 08-CR-820

Dated: OCT 08 2009

Dear Judge Daniels,

This firm represents the defendant, Ilya Boruch, in the above-referenced case. Mr. Boruch's wife, Yuliya Boruch, is pregnant with the couple's second child and has a due date of February 10, 2010. A copy of a certificate of professional care from her treating physician, Dr. Nodar Kozhin, M.D, is enclosed. I write to request the Court's permission for Mr. Boruch to attend the birth of his child and to remain at the hospital during his wife's admission.

It is my understanding that a similar request was granted for the birth of Mr. Boruch's first child in the fall of 2008. At that time, Mr. Boruch called Pretrial Services and left a message about the impending birth before accompanying his wife to the hospital. He was subsequently permitted to remain at the hospital with his wife for the 3-day duration of her admission and provided a note from the hospital to Pretrial Services after his wife and child were discharged. Mr. Boruch anticipates a similar process for the birth of his second child, and requests a similar modification of his conditions at the appropriate date.

Because a birth is an unexpected event, an exact date is impossible to predict. I therefore ask that the Court permit Mr. Boruch to accompany his wife to the hospital when she enters labor and to inform his pre-trial services officer of his whereabouts as soon as practicable.

I have discussed this matter with AUSA Thomas Brown and Pre-trial Services Officer Franco Furelli, neither of whom object to Mr. Boruch attending the birth. Thank you for your time and consideration in this matter.

Respectfully submitted,

Edward J. McQuat, Esq.  
The Blanch Law Firm, P.C.  
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(212) 736-9721  
*Attorney(s) for Defendant*

Enclosures

Cc: AUSA Thomas Brown  
Pre-trial Services Officer Franco Furelli

**OBSTETRICAL & GYNECOLOGICAL, P.C.**

**Leo Boter, M.D.**

**Nodar Kozhin, M.D.**

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**CERTIFICATE OF PROFESSIONAL CARE**

Date 8/27/09

This is to certify that

Yuliya Boruch

is under my care for the following:

Pregnancy 17 weeks  
Expected date of  
delivery 2/10/2010

Dr.

Boter